

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

ALVION PROPERTIES, INC.)	Chapter 11
)	
• Debtor.)	CASE NO. 15-40462
)	

MOTION TO APPOINT DISBURSING AGENT

Now comes the Debtor, Alvion Properties, Inc., by its attorney, and states the following in support of this motion:

1. On May 14, 2015 Debtor filed a petition herein under Chapter 11 of the Bankruptcy Code.
2. On September 11, 2015 Debtor filed a proposed Chapter 11 Plan and on September 23, 2015 Debtor filed a proposed First Amended Disclosure Statement.
3. The Debtor will fund its Plan by sale of a considerable amount of its assets to pay its creditors.
4. The Debtor will also be filing a Motion to Sell the real estate in conjunction with its Chapter 11 Plan.
5. The Debtor desires to have a disbursing agent receive the proceeds and ultimately make distribution of the proceeds to its creditors pursuant to a confirmed Chapter 11 Plan or Order to Disburse on the approval of the sale of assets.
6. Debtor's attorney has spoken with attorney Robert Eggmann who has indicated his willingness to act as disbursing agent.
7. Robert Eggmann is qualified to act as disbursing agent having done so in previous Chapter 11 cases and also serves as a Panel Chapter 7 Trustee for Region 10

of the Office of the United States Trustee.

8. Attorney Eggmann as disbursing agent, would receive all net proceeds from the sale of real estate to be disbursed in this Chapter 11.

WHEREFORE, Debtor prays that the Court authorize the employment of Robert Eggmann as disbursing agent and for such further relief as the Court deems just.

ALVION PROPERTIES, INC., DEBTOR

By /s/ Douglas A. Antonik
DOUGLAS A. ANTONIK
Registration #06190629

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CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon:

- Mark Skaggs, U.S. Trustees Office, 401 Main Street, Suite 1100, Peoria, IL 61602
- Ziemer, Stayman, Weitzel & Shoulders, LLP, Attn: Nick J. Cirignano, P.O. Box 916, Evansville, IN 47706-0916
- Joel A. Kunin, Esq., The Kunin Law Offices, LLC, 1606 Eastport Plaza Drive, Ste. 110, Collinsville, IL 62234-6134
- The Coffman Law Firm, Richard Coffman, 505 Orleans, Suite 505, Beaumont, TX 77701
- Clancy Covert, PO Box 15307, Chattanooga, TN 37415
- Dana Petway, 250 Sandersferry Rd., Condo 29, Hendersonville, TN 37075
- Darrell Dunham, PO Box 803, Carbondale, IL 62903
- David Cox, PO Box 789, Harrisburg, IL 62946
- Jack Harper, 400 S. Granger, Harrisburg, IL 62946
- Keith Grant, 633 Chestnut St., Ste. 700, Chattanooga, TN 37415
- Robinson Smith and Wells, 633 Chestnut St., Ste. 700, Chattanooga, TN 37415
- Ron Pickering, 214 Estate Dr., New Iberia, LA 70563
- Robert Eggmann, Desai Eggmann Mason LLC, 7733 Forsyth Blvd., Suite 800, St. Louis, MO 63105
- Alvion Properties, Inc., 22 S. Main St., Harrisburg, IL 62946

either electronically or by enclosing in an envelope with postage fully prepaid and by depositing said envelope in a U. S. Post Office mail box in Mt. Vernon, Illinois, on the 23rd day of October, 2015. The above is true and correct to the best of the undersigned's knowledge.

/s/ Alisha Finke
Alisha Finke

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DECLARATION OF DISINTEREST PURSUANT
TO BANKRUPTCY RULE 2014(a)

STATE OF MISSOURI)
)
COUNTY OF ST. LOUIS)

NOW COMES Robert Eggmann, who makes the following statement under oath:

1. I am an attorney authorized to practice my profession under the laws of the State of Illinois.
2. I work at Desai Eggmann Mason LLC located at 7733 Forsyth Boulevard, Suite 800, St. Louis, MO 63105.
3. The Debtor has asked that I be the disbursing agent on behalf of the estate. I am experienced and qualified in the matters for which I am to be employed.
4. To the best of my knowledge, neither my firm nor I hold or represent any interest adverse to the interest of the estate. Neither my firm nor I have any connection with the debtor, creditors, any other party interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee.
5. Neither I nor my firm has shared or agreed to share and will not share or agree to share, any compensation paid to it with any other person.

7. The hourly rate charged by myself is \$360.00 per hour and for associate attorneys \$230.00 per hour. The hourly rate charged by paralegals is \$170 per hour and law clerks at \$195 per hour. Said rates are good through December 31, 2015.

8. I understand that I must keep detailed records of time and expenses.

Dated this 22nd day of October, 2015.



Robert E. Eggmann, Attorney at Law

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